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Health and the Environment

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June 25, 2004

Dr. C. W. Jameson
National Toxicology Program
Report on Carcinogens
79 Alexander Drive
Building 4401, Room 3118
P.O. Box 12233
Research Triangle Park, NC 27709

Re: Nominations on glass wool (respirable size)

Dear Dr. Jameson:

The purpose of this letter is to bring to your attention information that I believe should be taken into account by the National Toxicology Program when it considers the listing of glass wool, an agent that is scheduled to be reviewed for the Twelfth Edition of the Report on Carcinogens.

According to the Federal Register Notice of May 19, 2004 (FR28940), two nominations have been made for glass wool. The North American Insulation Manufacturers Association nominated "glass wool (respirable size)," currently listed as *Reasonably Anticipated to be a Human Carcinogen*, for delisting. The National Institute of Environmental Health Sciences nominated "special glass wool fibers" currently unlisted, for inclusion as *Reasonably Anticipated to be a Human Carcinogen*.

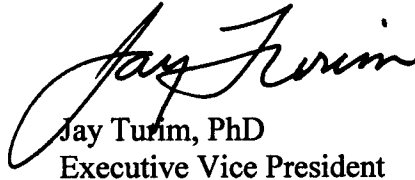
The fact that these two very different materials are displayed in the Federal Register Notice under the same name, "glass wool (respirable size)" is symptomatic of the confusion surrounding the definition and characterization of various types of synthetic vitreous fibers (SVFs). Although it is true that the two agents under review are glass wools, so are all other members of the SVF family. Therefore, to avoid any confusion concerning SVFs now or in the future, it is important to be explicit and consistent in characterizing them.

I enclose a peer-reviewed paper entitled "Characterization and Nomenclature of Vitreous Silicate Wools," of which I was one of the co-authors, which addresses the definition and characterization conundrum and provides recommendations on how to resolve it. If you

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would like further information on this topic, my colleagues and I would be happy to supply it. We are also available to make a presentation on the subject and discuss it directly with NTP, if you should so desire.

Sincerely yours,



Jay Turim, PhD
Executive Vice President

Enclosure

Please Note: Due to Copyright Infringement Laws the journal article referred to in Jay Turim's public comments cannot be publicly displayed. Listed below is the citation for this article.

**Report on Carcinogens Group
National Toxicology Program**

Moore, M.A., Boymel, P.M., Maxim, L.D., and Turim, J. (2003) Categorization and Nomenclature of Vitreous Silicate Wools. *Regulatory Toxicology and Pharmacology*, **35**: 1-13.